

**OCCUPATIONAL SAFETY
AND HEALTH STANDARDS BOARD**

2520 Venture Oaks Way, Suite 350
Sacramento, CA 95833
(916) 274-5721
FAX (916) 274-5743
www.dir.ca.gov/oshsb



FINAL STATEMENT OF REASONS

CALIFORNIA CODE OF REGULATIONS

Title 8: Division 1, Chapter 4, Subchapter 21, Article 1,
Section 8608 of the Telecommunication Safety Orders.

Fixed Ladders and Steps for Telecommunication Towers and Poles

**MODIFICATIONS AND RESPONSE TO COMMENTS RESULTING FROM
THE 45-DAY PUBLIC COMMENT PERIOD**

There are no modifications to the information contained in the Initial Statement of Reasons.

SUMMARY AND RESPONSE TO ORAL AND WRITTEN COMMENTS

I. Written Comments

Mr. Van A. Howell, CSP, Area Director, U.S. Department of Labor, Occupational Safety and Health Administration, by letter dated June 13, 2011.

Comment:

Mr. Howell stated that Federal OSHA has reviewed the proposal and found it to be commensurate with federal protections.

Response:

The Board thanks Mr. Howell for his comment and participation in the Board's rulemaking process.

II. Oral Comments

Oral Comment received at the June 16, 2011, Public Hearing in Oakland, CA.

Mr. Jay Weir, Attorney, representing Employee Health and Safety for AT&T.

Mr. Weir, thanked Board staff for the opportunity to participate in the advisory committee for this rulemaking proposal.

The Board thanks Mr. Weir for his support of the proposal and participation in the Board's rulemaking process.

ADDITIONAL DOCUMENTS RELIED UPON

None.

ADDITIONAL DOCUMENTS INCORPORATED BY REFERENCE

None.

DETERMINATION OF MANDATE

This standard does not impose a mandate on local agencies or school districts as indicated in the Initial Statement of Reasons.

ALTERNATIVES CONSIDERED

The Board invited interested persons to present statements or arguments with respect to alternatives to the proposed regulation. No alternative considered by the Board would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the adopted action.